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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Minerva Garza,  
Plaintiff,  
vs.  
Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

} Case No. 1:22-cv-00207-DAD-GSA

} STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF  
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from August 15, 2022 to September 14, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Counsel for the Plaintiff is currently out of State attending to an emergency with her ill father. (see

1 attached declaration). Additional time will be needed in light of limited access to  
2 her computer.

3 Counsel requires additional time to brief the issues thoroughly for the  
4 Court's consideration. Defendant does not oppose the requested extension.  
5 Counsel apologizes to the Defendant and Court for any inconvenience this may  
6 cause.

7  
8 Respectfully submitted,

9 Dated: August 15, 2022 PENA & BROMBERG, ATTORNEYS AT LAW  
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11 By: /s/ Dolly M. Trompeter  
12 DOLLY M. TROMPETER  
13 Attorneys for Plaintiff

14  
15 Dated: August 15, 2022 PHILLIP A. TALBERT  
16 United States Attorney  
17 PETER K. THOMPSON  
18 Acting Regional Chief Counsel, Region IX  
19 Social Security Administration

20 By: \*/s/ Oscar Gonzalez de Llano  
21 Oscar Gonzalez de Llano  
22 Special Assistant United States Attorney  
23 Attorneys for Defendant  
24 (\*As authorized by email on August 15, 2022)

## **ORDER**

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: August 15, 2022

**/s/ Gary S. Austin**  
UNITED STATES MAGISTRATE JUDGE